

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

Motion GRANTED,
conditioned upon the
timely filing of a waiver
of speedy trial.

UNITED STATES OF AMERICA

V.

DANIEL SCHUSTER

**No. 3:13-00234
JUDGE TRAUGER**

**MOTION TO CONTINUE TRIAL AND TO EXTEND TIME
FOR FILING PRETRIAL MOTIONS**

Through counsel, defendant Daniel Schuster moves to continue the trial of this matter and to extend the time for filing pretrial motions until 28 days before the trial. This matter currently is set for trial on February 25, 2014. Mr. Schuster is released on bond pending trial.

In support of this motion, Mr. Schuster would show the following: Counsel has received discovery but has not yet had an opportunity to meet with Mr. Schuster, who works for long periods of time on a barge and will be returning to town this week. Counsel plans to meet with Mr. Schuster within the next week. Until Mr. Schuster and counsel meet, defense counsel is not in a position to determine whether pretrial motions are necessary or appropriate, and cannot identify appropriate investigation or trial strategy.

Counsel has discussed the possibility of a continuance with Mr. Schuster, who concurs in the request and will be signing and filing a speedy trial waiver.

Assistant U.S. Attorney Braden Boucek advises that he has no opposition to a continuance of this matter.

For these reasons, Mr. Schuster moves to continue the trial and to extend the time for filing pretrial motions until 28 days before the trial.